

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SUBHASH MANNAVA, an individual,	)	
	)	Civil No. 21-cv-1303
Plaintiff,	)	
	)	Judge Matthew F. Kennelly
v.	)	
	)	Magistrate Judge M. David Weisman
TD AMERITRADE, INC., a New York	)	
Corporation, et al,	)	
	)	
Defendants.	)	

**DEFENDANT TD AMERITRADE, INC.’S**  
**MOTION TO DISMISS OR STAY AND COMPEL ARBITRATION**

Defendant TD Ameritrade, Inc. (“TD Ameritrade” or “Defendant”) hereby moves this Court, pursuant to the Federal Arbitration Act, 9 U.S.C. § 1 *et al.*, for the entry of an order dismissing, or in the alternative, staying Plaintiff Subhash Mannava’s (“Plaintiff”) claims against TD Ameritrade and compelling Plaintiff to arbitrate his claims (“Motion”).

As shown in the accompanying Memorandum, Plaintiff opened an account with TD Ameritrade and agreed to the terms of TD Ameritrade’s Client Agreement, then in effect and as amended from time-to-time.<sup>1</sup> The Client Agreements include express arbitration provisions that cover Plaintiff’s claims against TD Ameritrade in this action. Accordingly, Plaintiff’s claims before this Court are subject to binding arbitration, and this litigation against TD Ameritrade should be dismissed or, in the alternative, stayed pending arbitration.

WHEREFORE, for the reasons stated in the Memorandum submitted concurrently herewith, Defendant TD Ameritrade, Inc. respectfully requests the entry of an order dismissing, or

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<sup>1</sup> Capitalized terms used, but not otherwise defined herein, shall have the meanings ascribed to them in Defendant TD Ameritrade, Inc.’s Memorandum in Support of its Motion to Dismiss or Stay and Compel Arbitration (“Memorandum”), filed concurrently herewith.

in the alternative, staying Plaintiff Subhash Mannava's claims against it, compelling Plaintiff to arbitrate his claims against TD Ameritrade, Inc., and granting any other relief this Court deems appropriate.

Dated: August 9, 2021

Respectfully submitted,

TD AMERITRADE, INC.

By: /s/ Demetria L. Hamilton

Lauren J. Caisman

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